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**ATTORNEYS FOR GRANT JAMES SCOTT**

THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In re:	§	
	§	
HIGHLAND CAPITAL MANAGEMENT,	§	Case No. 19-34054-SGJ
L.P.,	§	
	§	Chapter 11
Debtor.	§	

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**WITNESS AND EXHIBIT LIST**

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COMES NOW, Grant James Scott III ("**Mr. Scott**"), a party-in-interest in this case, and files this Witness and Exhibit List for the hearing scheduled for **Thursday, August 19, 2021, at 9:30 a.m. CST** (the "**Hearing**") before the Honorable Stacey G. Jernigan on the *Motion of the Official Committee of Unsecured Creditors and the Litigation Advisor for Entry of an Order Authorizing the Examination of Rule 2004 Parties Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure* [Docket No. 2620] in the above-captioned chapter 11 bankruptcy case.

**WITNESSES**

Mr. Scott may call any of the following witnesses at the Hearing, in person or by proffer:

1. Any witness called or designated by any other party.
2. Any impeachment or rebuttal witnesses.

**EXHIBITS**

Mr. Scott may offer into evidence one or more of the following exhibits at the Hearing:

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
1.	November 17, 2020 email from P. Foley to J. Kane, B. Clark regarding search terms for secondary production of documents by CLO Holdco in response to Committee's Request for Production of Documents.			
2.	December 1, 2020 email correspondence from J. Kane to J. Morris, S. Vitiello, and I. Leventon regarding Debtor production of G. Scott communications, with attachments (a) CLO Holdco Motion for Clarification and (b) Order on CLO Motion for Clarification.			
	Any pleadings, reports, or other documents filed in the Debtor's bankruptcy case			
	Any exhibits offered by any other party			
	Any exhibits necessary for impeachment purposes			
	Any exhibits necessary for rebuttal purposes			
	Any attachments or exhibits to any of the foregoing documents			

Mr. Scott reserves the right to: (i) use any exhibits presented by any other party; (ii) request that the Court take judicial notice of any pleadings filed in the Debtor's bankruptcy case; (iii) use any exhibits not listed herein for impeachment and rebuttal purposes; (iv) limit any exhibits to redacted form; and (v) supplement or amend this Witness and Exhibit List at any time prior to the Hearing.

DATED: August 17, 2021

Respectfully submitted,

**KANE RUSSELL COLEMAN LOGAN PC**

By: /s/ John J. Kane  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 17, 2021, a true and correct copy of the foregoing *Witness and Exhibit List* was served via the Court's electronic case filing (ECF) system upon all parties receiving such service in this bankruptcy case. Copies of Mr. Scott's proposed Exhibits were provided via e-mail upon the following parties, and to any other party who requested Mr. Scott's Exhibits, subject to this Court's prior protective orders.

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/s/ John J. Kane  
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